

Environmental Standard Operating Procedure			
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Title: Woodworking

1.0 PURPOSE

The purpose of this Environmental Standard Operating Procedure (ESOP) is to provide environmental guidelines for performing woodworking activities.

2.0 APPLICATION

This guidance applies to those individuals who perform woodworking operations onboard Marine Corps Air Station (MCAS) Miramar.

3.0 REFERENCES

- 40 CFR 262 (Code of Federal Regulations)
- 29 CFR 1910
- 22 CCR 66265.31 (California Code of Regulations)
- MCO P4790.2C
- MCO P5090.2A
- SDAPCD Permits to Operate 931071 (San Diego Air Pollution Control District)
- NPDES General Permit CAS000001 Section A (10)(a) (National Pollutant Discharge Elimination System)
- Hazardous Waste Management Plan

4.0 PROCEDURE

4.1 Discussion:

Woodworking operations require the use of hazardous materials such as paints, stains, varnish, wood glue and other hazardous materials which must be managed properly to avoid impacts to human health and the environment. All hazardous materials must be stored in approved containers. Units should contact the Environmental Management Department (EMD) for replacement or to request additional containers.

4.2 Operational Controls:

The following procedures apply:

1. Ensure that Material Safety Data Sheets (MSDS) for paints, stains, varnish, solvent, wood glue, and any other materials associated with this practice are available and current.
2. Ensure that records of all required training and certifications are current and available for inspection.
3. Ensure turnover folder information is kept for this practice.
4. Wear appropriate personal protective equipment (PPE) such as eye protection, face shields, hearing protection, gloves, steel-toed boots, dust masks, and coveralls when appropriate.
5. Keep a fully stocked spill kit nearby in a designated location known to all personnel and located near any potential hazardous areas.
6. Keep fire extinguishers readily accessible and near potential hazardous areas.
7. Ensure that all required permits are current and available for inspection.
8. Ensure that operation manual, model number, supplier, parts and usage specifications for each piece of equipment is available and is in a designated location known to all shop personnel.
9. Maintain records of spray booth usage time.
10. Conduct periodic maintenance on spray booth as recommended by manufacturer.
11. Store all usable hazardous materials (e.g. varnish, wood glue, cement, paint, stains, solvent, etc.) in the hazardous materials (HAZMAT) locker.
12. Inspect hazardous materials storage area locker weekly.
13. Ensure that all inspection records are maintained and available for examination for three years.
14. Maintain a daily usage log recording the amounts and types of hazardous materials used each day and submit log to EMD on a monthly basis.
15. Collect and store any hazardous waste in approved containers authorized for use intended. Only use transfer containers equipped with lids. Check containers for deterioration and structural integrity and request new containers if needed.
16. Properly label all containers completely and legibly with the following information: the words "Hazardous Waste" on outside of container, accumulation start date, and Environmental Protection Agency (EPA) number (e.g. D003).
17. Ensure that used fluids are not cross-contaminated with any other fluids or materials. This requires maintaining dedicated transfer containers for each waste stream.
18. Keep containers closed except when waste is added or removed.

19. Ensure containers and drums containing ignitable waste in the satellite accumulation area (SAA) are grounded.
20. Ensure containers and drums are not overfilled. Containers and drums are considered full when 3 to 4 inches of head space remains to allow for thermal expansion.
21. Maintain a hazardous waste log which includes container type, accumulation start date, accumulation end date, date container was taken to 60 day storage area, and manifest number
22. Contact the Hazardous Waste Minimization (HAZMIN) center when containers or drums are full for transfer to the 60 day storage area.
23. Properly clean up all spills as soon as they are identified and report the spill to the supervisor and EMD.
24. Record all spills in a spill log book detailing the spill date, time, product spilled, quantity, location, cleanup actions taken and the name of the person reporting the spill and ensure that a spill report containing this information is submitted to the EMD.
25. Place used rags in approved containers for recycling. Turn in full, used rag containers at the HAZMIN center and obtain an empty container
26. Ensure that containers or inner liners larger than five gallons that previously held hazardous waste are properly marked with word "Empty" and the date it was emptied.
27. Ensure that warning signs (e.g. "Hearing and Eye Protection Required" and "Paint Booth in Operation") are clearly visible and legible from a distance of 25 feet in any direction.
28. If there are any specific situations or other concerns not addressed by this procedure, contact the EMD.

4.3 Documentation and Record Keeping:

The following records must be maintained:

1. MSDSs for all materials associated with this practice.
2. Training records and certifications for all applicable personnel.
3. Operation manuals, model number, supplier, parts and usage specifications, etc. for all equipment.
4. Daily usage log.
5. Hazardous materials inventory (must match Authorized Usage List).
6. Hazardous waste log.
7. Spill log book.

4.4 Training:

All personnel must be trained in this ESOP, to include the following, as applicable:

- 1. Hazard Communication (HazCom) Training.
- 2. First Responder Awareness (FRA) Training.
- 3. Business Plan Topics 1-4.
- 4. Indoctrination Certifications.
- 5. Hazardous Waste Coordinator Certification (initial and annual).
- 6. On-the-job training.

4.5 Emergency Preparedness and Response Procedures:

Refer to the Emergency Response Plan and MCO P5090.2A, Subject: Oil/Hazardous Substance Spills (OHSS) and Spill Prevention Containment & Countermeasures (SPCC) for MCAS Miramar.

4.6 Inspection and Corrective Action:

The Environmental Compliance Coordinator (ECC) shall perform or designate personnel to perform inspections. The ECC shall ensure deficiencies noted during the inspections are corrected immediately. Actions taken to correct each deficiency shall be recorded on the inspection sheet.

Woodworking – Inspection Checklist	
Date:	Time:
Installation:	Work Center:
Inspector's Name:	Signature:

Inspection Items	Yes	No	Comments
1. Are MSDSs for all materials associated with this practice current and available? <i>(29 CFR 1910)</i>			
2. Are required current training records and certifications maintained for all personnel? <i>(MCO P5090.2A)</i>			
3. Are turnover folders kept for this practice? <i>(MCO P4790.2C)</i>			

4. Is appropriate PPE worn when applicable? <i>(29 CFR 1910)</i>			
5. Is a spill kit maintained nearby in a designated location known to all shop personnel? <i>(29 CFR 1910, 22 CCR 66265.31, HWMP)</i>			
6. Are fire extinguishers nearby in designated locations known to all shop personnel? <i>(29 CFR 1910)</i>			
7. Are all required permits current and available for inspection? <i>(SDAPCD Permit)</i>			
8. Are operation manuals, model numbers, suppliers, and parts and usage specifications for each piece of equipment available and in a designated location known to all shop personnel? <i>(MCO P5090.2A)</i>			
9. Is spray booth usage time documented? <i>(MCO P5090.2A, SDAPCD Permit)</i>			
10. Is periodic maintenance of spray booth conducted as recommended by manufacturer? <i>(MCO P5090.2A)</i>			
11. Are all usable hazardous materials stored in the HAZMAT locker? <i>(29 CFR 1910, MCO P5090.2A)</i>			
12. Is hazardous materials storage area inspected weekly? <i>(29 CFR 1910, MCO P5090.2A)</i>			
13. Are all inspection records maintained and available for 3 years? <i>(MCO P5090.2A)</i>			
14. Is a daily usage log maintained and submitted to EMD monthly? <i>(MCO P5090.2A, SDAPCD Permit 931071)</i>			
15. Is all hazardous waste collected and stored in approved containers authorized for use intended? Are all containers equipped with lids? Are containers checked for deterioration and structural integrity and replaced when appropriate? <i>(40 CFR 262, MCO P5090.2A)</i>			
16. Are all containers properly labeled with the following information: the words "Hazardous Waste", accumulation start date, and EPA number? <i>(40 CFR 262, MCO P5090.2A)</i>			
17. Are dedicated transfer containers used for each waste stream in order to keep used fluids free from cross-contamination with other fluids or materials? <i>(MCO P5090.2A)</i>			
18. Are storage containers kept closed except when waste is added or removed? <i>(22 CCR 66265.173(a) SDAPCD Permit)</i>			
19. Are containers, drums or ASTs with ignitable waste			

in the HW satellite storage area grounded during waste accumulation? <i>[29 CFR 1910, 22 CCR 66265.173(b)]</i>			
20. Are 3 - 4 inches of headspace left in drums to allow for liquid expansion? <i>(29 CFR 1910, 22 CCR 66265.173(b), MCO P5090.2A)</i>			
21. Is the hazardous waste log maintained to include types of containers, accumulation start dates, accumulation end dates, date containers were taken to the SAA, and manifest numbers? <i>(40 CFR 262)</i>			
22. Is the HAZMIN center contacted when drums or containers are full for transfer to their facility? <i>(MCO 5090.2A)</i>			
23. Are all spills cleaned up immediately and reported to the supervisor and EMD? <i>(40 CFR 262)</i>			
24. Are all spills recorded in a spill log book detailing the spill date, time, product spilled, quantity, location, cleanup actions taken and the name of the person reporting the spill, and is a report submitted to EMD? <i>(40 CFR 262, MCO P5090.2A)</i>			
25. Are used rags placed in approved containers for recycling and full used rag containers turned in at the HAZMIN center? <i>(MCO P5090.2A)</i>			
26. Are containers or inner liners larger than five gallons that previously held HW properly marked with the word "Empty" and the date they were emptied? <i>[22 CCR 66261.7(f)]</i>			
27. Are warning signs clearly visible and legible from a distance of 25 feet in any direction? <i>[22 CCR 265.17(a) HWMP Sec:3.2.2A]</i>			

ADDITIONAL COMMENTS:

CORRECTIVE ACTION TAKEN:

Environmental Compliance Coordinator

Name: _____

Signature: _____

Date: _____